

EXHIBIT B

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF NEW YORK

Blake Lively, et al.

Plaintiff(s)

VS.

Case No: 1:24-cv-10049; 1:25-cv-00449

Wayfarer Studios LLC, et al.

Defendant(s)

AFFIDAVIT OF DUE DILIGENCE

I, **Erick Salas**, a Private Process Server, having been duly authorized to make service of the Subpoena Duces Tecum with Attachment A, in the above entitled case, hereby depose and say:

That I am over the age of eighteen years and not a party to or otherwise interested in this matter.

That after due search, careful inquiry and diligent attempt(s), I have been unable to serve Matthew Mitchell with the above named process.

That on May 5, 2025 at 5:55 PM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I received no answer at the door after knocking for several minutes, although I could hear dogs barking inside.

That on May 6, 2025 at 6:35 PM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, again, although I heard dogs barking inside, I could not summon anyone to the door after knocking for several minutes.

That on May 8, 2025 at 9:24 AM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I spoke to a female resident who stated that her name was Cynthia Beachor (described as a Caucasian woman in her thirties), who stated that Matthew Mitchell was unknown to her and did not reside therein.

That on May 23, 2025 at 6:34 PM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I conducted surveillance outside of Apartment 405. I did not observe any activity at the unit until 8:35 PM, when an African American couple walked by and started to enter Apartment 408. Accordingly, I inquired if Matthew Mitchell resided in Apartment 405, however they stated that they did not know the occupant of Apartment 405 by name. At 9:04 PM, I knocked on the door of Apartment 405, however I did not receive an answer. I departed at 9:11 PM.

That on May 24, 2025 at 9:44 AM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I was unable to gain access into the secured building after waiting outside for 11 minutes.

That on May 25, 2025 at 12:22 PM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, as before, I was unable to gain access into the secured building after waiting outside for 30 minutes.

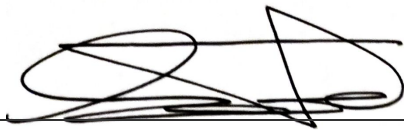
That on May 27, 2025 at 5:52 PM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I waited outside of the secured building until 6:24 PM, when I was able to gain access inside the secured building. Accordingly, I waited outside of Apartment 405. At around 7:47 PM, I spoke with a Caucasian couple named Jen and Armand who passed by Apartment 405. They stated that all they knew was that there were two African American males in their late 30s or 40s living in Apartment 405. In addition, they stated that sometimes they see an African American woman there on occasion, but claimed to not know any of their names. At 8:05 PM, I knocked on the door of

Apartment 405 for several minutes, but I did not receive an answer at the door, and I departed at 8:17 PM after I observed no further activity.

That on May 28, 2025 at 6:54 AM, I attempted to serve Matthew Mitchell at 9005 Cynthia Street, Apartment 405, West Hollywood, California 90069. On this occasion, I waited outside of the secured building until 7:18 AM, when I was able to gain access inside the building. Accordingly, I waited outside of Apartment 405. At 8:12 AM, a Caucasian woman in her 30s exited Apartment 412 with a minor child, and I inquired if Matthew Mitchell resides within Apartment 405. The woman started questioning why I was there, and who I was, and I stated my reasoning for being there and that I had documents to deliver to Matthew Mitchell. The woman stated that she did not know who resided within Apartment 405, and that she was not happy that I was in the hallway. The woman also refused to provide her name. At 9:04 AM, I knocked on the door of Apartment 405 for several minutes, but I did not receive an answer at the door at this time. In addition, I started calling out Matthew Mitchell's name outside of the door, but I did not hear any activity inside.

I solemnly affirm under the penalties of perjury that the contents of this document are true to the best of my knowledge, information, and belief.

Executed on 06/04/2025


A handwritten signature in black ink, appearing to read 'Erick Salas', is written over a horizontal line.

Erick Salas

Client Ref Number: 135053-00001

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